

## **EXHIBIT “A”**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

VULCAN GOLF, LLC, JOHN B.	§	
SANFILIPPO & SONS, INC.,	§	
BLITZ REALTY GROUP, INC.,	§	
and VINCENT E. "BO" JACKSON,	§	
Individually and on Behalf of All	§	
Others Similarly Situated,	§	Civil Action No. 07 CV 3371
	§	
Lead Plaintiffs,	§	
	§	Honorable Blanche M. Manning
v.	§	
	§	Magistrate Judge Geraldine Soat Brown
GOOGLE INC., OVERSEE.NET,	§	
SEDO LLC, DOTSTER, INC., AKA	§	
REVENUEDIRECT.COM,	§	
INTERNET REIT, INC. d/b/a IREIT, INC.,	§	
and JOHN DOES I-X,	§	
	§	
	§	
Defendants.	§	

**MOTION FOR PRELIMINARY INJUNCTION**

Class Plaintiffs, individually and on behalf of the putative class, file this Motion for Preliminary Injunction pursuant to Rule 65 of the Federal Rules of Civil Procedure.

**I. INTRODUCTION**

1. Defendants' ongoing and intentional use and monetization of Deceptive Domains, and associated misconduct (as set forth more fully in the First Amended Complaint (hereinafter "FAC")), has necessitated this Motion for Preliminary Injunctive Relief. Further, Defendant Google's and Defendant Domain Sponsor's use and monetization of Deceptive Domains that are obscene and pornographic (incorporating Class Plaintiff "Bo Jackson" in the domain name) and, that contain shockingly explicit, offensive, obscene and pornographic words, images, and advertisements require immediate injunctive relief to prevent further irreparable harm to the

good reputation of Class Plaintiff Bo Jackson. Likewise, pornographic and obscene Domain Names that contain putative class members' Distinctive and Valuable Marks are equally injurious to their goodwill, reputations, business and personal property. Such conduct must be stopped.

2. Since the filing of the FAC, Class Plaintiffs have both verbally (at the Rule 26 Conference and over the telephone) and in writing, demanded that Defendants cease monetization and use of Deceptive Domains that infringe upon the Class Plaintiffs' and putative class members' Distinctive and Valuable Marks. After repeated and continued ongoing violations, on October 4, 2007 Class Plaintiffs made a final warning to Defendants to once again cease use and monetization of Deceptive Domains or Class Plaintiffs would be forced to seek Court intervention. *See Attached Correspondence Between The Parties, Exhibit "A".*

3. In response to Class Plaintiffs' October 4, 2007 correspondence, Defendants once again made insincere agreements to cease use and monetization of Deceptive Domains that infringe upon the Distinctive and Valuable Marks belonging to Class Plaintiffs<sup>1</sup>, apparently doing so in a calculated attempt to prevent Class Representatives from seeking this Court's intervention.

4. However, despite repeated verbal and written assurances, Defendants have not stopped use and monetization of Deceptive Domains, but rather, they continue to brazenly taste, register, use, engage in cybersquatting, cyberpiracy, typosquatting, hijacking of traffic, monetization of Deceptive Domains and other clearly injurious and illegal conduct that damages Class Plaintiffs' and the putative class members' property and reputations. Defendants continue

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1. Defendants even made false representations to this Court that they had ceased use and monetization of Deceptive Domains infringing upon Class Plaintiffs' Distinctive and Valuable Marks. *See Google Motion to Dismiss, 2, 5.*

said conduct on an outrageous scale, with millions of violations occurring just since the filing of the FAC.

5. Defendant Google and Defendant Domain Sponsor have placed obscene and pornographic advertisements on pornographic/obscene Deceptive Domains containing Class Plaintiff Bo Jackson's good name, including: BoJacksonNude.com; BoJacksonSex.com; BoJacksonPorn.com; xxxbojackson.com; bojacksonxxx.com; and bojacksonsporn.com. See attached Exhibit "B".

6. Following are just a few examples of Deceptive Domains used and monetized since November 13, 2007 by the Defendants:

BlitzRealtyGrup.com  
BoJacksonNude.com  
BoJacksonSex.com  
BoJacksonPorn.com  
buyfishernuts.com  
vulgangolf.com  
vulcingolf.com  
vulcengolf.com  
blitzrealtygrop.com  
bojacksonsporn.com  
vulkangolf.com  
bojacksonxxx.com  
xxxbojackson.com  
bojacksonpics.com

The screenshots associated with these Deceptive Domains are attached hereto as *Exhibit "B"*.

7. To demonstrate the sheer egregiousness and deception of Defendants, Class Plaintiffs have chosen to identify Deceptive Domains registered and monetized by Defendants in the very short period since the filing of their Reply Memorandums on November 13, 2007. There are many additional examples that Class Plaintiffs can provide the Court, if desired. Since

November 13, 2007, one or more of the Defendants have registered and monetized the Deceptive Domains shown in *Exhibit "C"*.

8. Defendants' outrageous conduct, requiring preliminary injunctive relief, includes, but is not limited to:

- A. Generating revenue from obscene, elicit, offensive, and pornographic advertisements on Deceptive Domains containing Class Representative Bo Jackson's name, after the filing of the FAC and after the date Defendants represented to this Court (in their briefings in support of their motions to dismiss) that they had ceased monetizing Deceptive Domains that infringe on Class Plaintiffs' Distinctive and Valuable Marks;
- B. Continued tasting, registration, cybersquatting, typosquatting, kiting, cyberpiracy, monetization and use of Deceptive Domains, and other conduct as alleged in more detail in the FAC, on an ongoing and continuous basis, despite representations to this Court and the Class Plaintiffs that they would and have ceased said conduct; and
- C. Just since November 13, 2007, the date of Defendants' filing of Reply Memorandums in Support of their Motions to Dismiss, Defendants have registered and monetized **43** Deceptive Domains that blatantly infringe on Class Representatives' Distinctive and Valuable Marks and thousands of Deceptive Domains infringing on the class members' Distinctive and Valuable Marks.

9. The nature of the injuries being suffered by Class Plaintiffs and the putative class (loss of goodwill, reputation, customers, confusion, dilution, etc.), in conjunction with the highly obscene/offensive/pornographic advertisements placed on many Deceptive Domains, results in irreparable harm and makes legal remedies inadequate, thus necessitating preliminary injunctive relief.

## **II. DECEPTIVE DOMAINS USED SINCE FILING OF COMPLAINT**

10. Each of the above Deceptive Domains share the following common characteristics:

- i. Parked Domains (as defined in ¶83.v. of First Amended Complaint);

- ii. Advertising Only/Non-Content sites;
- iii. Domain names in which Defendants have no legitimate business, legal, property, or commercial right;
- iv. Domain Names that contain all or a significant portion of Class Plaintiffs' business or personal names; and
- v. Each Deceptive Domain generates revenue that is used, distributed and shared by Defendants, as set forth in the Deceptive Domain Scheme alleged in the FAC.

11. Five of the above Deceptive Domains contain highly offensive, explicit, obscene and pornographic language, images, and advertisements both in the Domain Name itself, and on the associated website: BoJacksonsex.com, BoJacksonporn.com, BoJacksonnude.com, NudeBoJackson, and BoJacksonNaked.com.

### **III. INJURY TO THE CLASS REPRESENTATIVES**

12. Each Plaintiff owns Distinctive and Valuable Marks that they are entitled to have protected, as plead in the FAC. (FAC ¶¶22, 27, 31, 36, 66.)

13. Defendants are, and have been, aware that Class Plaintiffs are the rightful owners of the Distinctive and Valuable Marks.

14. Defendants knowingly disregard Class Plaintiffs' rights and interests.

15. Class Plaintiffs are each suffering irreparable harm as a direct and proximate result of Defendants' use and monetization of Deceptive Domains that infringe their Distinctive and Valuable Marks, cyberpiracy, cybersquatting, typosquatting, tainting, kiting, hijacking/redirecting internet traffic away from Class Plaintiffs, and other such illegal conduct as set forth in more detail in the FAC.

16. Class Plaintiff Bo Jackson has and is suffering irreparable harm to his reputation, good name, and the goodwill associated with his name by Defendants' monetization of

offensive/pornographic Deceptive Domains (containing his name) with elicit, offensive, obscene and pornographic advertisements, including but not limited to: Teen Pornography, Gay Pornography, Ethnic Pornography (Asian, Black, etc.), “Big Tits,” “XXX,” “Cheap Porn,” “Eva Longoria Nude.” *See Exhibit “B.”*

17. Class Plaintiff Bo Jackson does not condone, authorize, or support in any way the sexual exploitation of teens, exploitation of famous people such as “Eva Longoria,” exploitation of and promotion of ethnic and racial pornography/obscenities, exploitation of female or male sexuality and degradation of humans through any form of pornography, elicit, and/or obscene material.

18. Class Plaintiff Bo Jackson did not grant any of the Defendants any rights, licenses, permission, or otherwise support, condone or accept the association of his good name with the highly offensive, obscene, pornographic and elicit material and advertisements on the Deceptive Domains containing the “Bo Jackson” name.

19. Class Plaintiff Bo Jackson has not been compensated or received any income from the registration, use, and /or monetization of said Deceptive Domains.

20. There is no adequate remedy at law for the injury to reputation, goodwill, distress and humiliation that Defendant Google and Defendant Domain Sponsor are currently causing Plaintiff Bo Jackson by associating his good name with shocking and offensive obscene material.

21. All Defendants routinely generate money from use of elicit/obscene/pornographic Deceptive Domains and the placement of obscene and pornographic internet advertisements on Deceptive Domains without the consent or permission of the rightful owner.

#### **IV. INJURY TO THE PUTATIVE CLASS**

22. Like Class Representatives, each putative class member is and continues to suffer

irreparable harm as a direct and proximate result of Defendants' use and monetization of Deceptive Domains that infringe upon their Distinctive and Valuable Marks, cyberpiracy, cybersquatting, typosquatting, kiting, tasting, hijacking/redirecting internet traffic away from Class Plaintiffs, and other illegal conduct as set forth in more detail in the FAC.

23. Injury and damage to goodwill, reputation, mark value, lost business, diversion of internet traffic and other such injuries can be difficult to measure, and therefore result in irreparable harm.

24. Defendants' ongoing illegal conduct, even since the filing of the FAC, is egregious and implicates the rights and property of hundreds of thousands of putative class members. Just a few examples follow (screenshots of said Deceptive Domains are provided in *Exhibit "D"*):

<b>Deceptive Domain</b>	<b>Defendants</b>	<b>Category of Mark</b>	<b>Class Member</b>
BrittneySpears.info	SEDO/GOOGLE	Famous Person	Brittney Spears
JustinTimberlake.info	SEDO/GOOGLE	Famous Person	Justin Timberlake
expressfshion.com	GOOGLE	Retail Store	Express Fashion
applecomputers.com	GOOGLE	Software/PC Manufacturing	Apple
sonie.com	SEDO/GOOGLE	Electronics	Sony
panasoni.com	GOOGLE	Electronics	Panasonic
Guci.com	GOOGLE	Retail Store	Gucci
tmobilde.de	SEDO/GOOGLE	Wireless Provider	Tmobile
Wii-fitness.co.uk	SEDO/GOOGLE	Video Game Systems	Nintendo
Tompetty.info	SEDO/GOOGLE	Famous Person	Tom Petty
samscloub.com	OVERSEE	Retail Store	Sam's Club
tmewarncable.com	OVERSEE	Cable Network	Time Warner
myspaced.com	IREIT	Social Network	Myspace
2meninatruck.com	DOTSTER	Moving Company	2 men and a truck
diesny.com	DOMAIN SPONSOR	Entertainment	Disney

25. Even at this early pre-discovery stage in this litigation, there are literally thousands of additional Deceptive Domains that Class Plaintiffs can provide the Court, if the Court so desires, that all share the following common characteristics:

- i. Parked Domains;
- ii. Advertising Only/Non-Content sites;
- iii. Domain names in which Defendants have no legitimate business, legal, property, or commercial right;
- iv. Domain Names that contain all or a significant portion of Class Plaintiffs' business or personal names; and
- v. Each Deceptive Domain generates revenue that is used, distributed and shared by Defendants, as set forth in the Deceptive Domain Scheme alleged in the FAC.

## **V. LEGAL STANDARD**

26. Class Plaintiffs seek a preliminary injunction against all Defendants pursuant to Rule 65 of the Federal Rules of Civil Procedure. Fed.R.Civ.P. 65. A party seeking a preliminary injunction must demonstrate that it has some likelihood of success on the merits, that there is no adequate remedy at law, and that it will suffer irreparable harm if the injunction is not granted. *Am. Gen. Corp. v. DaimlerChrysler Corp.*, 311 F.3d 796, 803 (7th Cir. 2002); *see also Ty, Inc. v. Jones Group, Inc.*, 237 F.3d 891, 895 (7th Cir. 2001). The Seventh Circuit set forth the applicable standard requiring moving parties: “need only demonstrate at the preliminary injunction stage that it has a ‘better than negligible’ chance of succeeding on the merits so that injunctive relief would be justified.” *Id.*

27. Preliminary injunctions are appropriate when serious questions are raised and the balance of hardships tips sharply in the moving party’s favor. *Sun Microsystems, Inc. v. Microsoft Corp.*, 188 F.3d 1115, 1119 (9th Cir. 1999); *Southwest Voter Registration Educ. Project v. Shelley*, 344 F.3d 914, 917 (9th Cir. 2003).

28. Preliminary injunctions are often granted in Lanham Act cases involving trademark violations due to the inadequacy of legal remedy for such hard to quantify damages

(loss of goodwill, diversion of business, reputation, etc.). *See Abbott Labs. v. Mead Johnson & Co.*, 971 F.2d 6, 11 (7th Cir. 1992); *International Kennel Club of Chicago, Inc. v. Mighty Star, Inc.*, 846 F.2d 1079, 1084 (7th Cir. 1988); *Ty, Inc. v. Jones Group, Inc.*, 237 F.3d 891 (7th Cir. 2001) citing *Brookfield Communications, Inc. v. West Coast Entm't Corp.*, 174 F.3d 1036, 1045 (9th Cir. 1999) (where the Court explained “[u]sing another's trademark in one's metatags is much like posting a sign with another's trademark in front of one's store” (*Brookfield*, 174 F.3d, at 1064)).

29. Further, the necessity of preliminary injunctive relief is well-recognized in cybersquatting cases under the Lanham Act, 15 U.S.C. §1115(d). *See Shields v. Zuccarini*, 89 F. Supp. 2d 634, 54 U.S.P.Q.2d (BNA) 1166, 1172 (E.D. Pa. 2000), subs proceedings 2000 WL 1056400 and 2000 WL 1053884 (E.D. Pa. 2000), both aff'd 254 F.3d 476, 59 U.S.P.Q.2d 1207, 1213 (3rd Cir. 2001); *1-800 Contacts, Inc. v. WhenU.com*, 309 F. Supp. 2d 467, 69 U.S.P.Q.2d (BNA) 1337, 195 A.L.R. Fed. 641 (S.D. N.Y. 2003); *Northern Light Technology v. Northern Lights Club*, 97 F. Supp. 2d 96 (D. Mass. 2000), aff'd, 236 F.3d 57 (1st Cir. 2001), cert. denied, 533 U.S. 911, 121 S.Ct. 2263, 150 L. Ed. 2d 247 (2001); *Porsche Cars North America, Inc. v. Spencer*, 55 U.S.P.Q.2d (BNA) 1026, 1032, 2000 WL 641209 (E.D. Cal. 2000); *Advance Magazine Publishers Inc. v. Vogue Intern.*, 123 F. Supp. 2d 790, 801 (D. N.J. 2000); *Electronics Boutique Holdings Corp. v. Zuccarini*, 56 U.S.P.Q.2d (BNA) 1705, 2000 WL 1622760 (E.D. Pa. 2000) (where the court explained that: “It is impossible to determine the number of potential and existing customers diverted from EB's website by Mr. Zuccarini's domain misspellings. A user-friendly website is important to EB's online success. There must be as few steps, or clicks, as possible between initially accessing EB's website and the completion of the transaction, as each computer click represents a significant amount of time. Those who get lost in the advertisements

may abandon their intention to purchase from EB. Others simply may never find EB's website. These customers may not only be discouraged from shopping at EB online, but may also be discouraged from shopping at EB's outlets in person as well. Furthermore, it is impossible to calculate the loss of reputation and goodwill caused by Mr. Zuccarini's domain misspellings. ..."); *DaimlerChrysler v. The Net, Inc.*, 388 F.3d 201, 203 (6th Cir. 2004), citing *Sporty's Farm L.L.C. v. Sportsman's Market, Inc.*, 202 F.3d 489, 493 (2nd Cir. 2000).

30. Each Class Plaintiff, as well as the putative class members, will suffer irreparable injury if this Court does not require Defendants to immediately cease registration, tasting, kiting, use and monetization of the Deceptive Domains. See *Larson v. Galliher*, 2007 WL 81930 (D. Nev. 2007).

**31. REASONABLE SUCCESS ON THE MERITS:**

A. Defendants have registered and monetized Deceptive Domains that are identical to, or confusingly similar to, Class Plaintiffs' Distinctive and Valuable Marks, without Class Plaintiffs' consent. See 15 U.S.C. §1114(a). This Court can make a simple comparison of the name of the Deceptive Domain and Class Plaintiffs' trademarks/distinctive/valuable marks rather than an assessment of the context in which each is used or the content of the offending website. *HER, Inc. v. RE/MAX First Choice, LLC* 468 F. Supp. 2d 964 (S.D. Ohio 2007), citing *Northern Light Technology v. Northern Lights Club*, 97 F. Supp. 2d 96, 117 (D. Mass. 2000);

B. Defendants violate 15 U.S.C. §1125(d), by their actions in (1) registering, trafficking in, or using Deceptive Domains that are identical to, or confusingly similar to, distinctive and valuable marks owned by Class Plaintiffs and/or the class; and (2) committing the acts with the bad faith intent to profit from Class Plaintiff's marks. See *Rosati's Franchise Sys., Inc. v. Rosati*, 2006 WL 163145, at \*5 (N.D. Ill. 2006) (citing 15 U.S.C. §1125(d)(1)). Each of

the Deceptive Domains alleged herein are:

- i. Parked Domains;
- ii. Advertising Only/Non-Content sites;
- iii. Domain names in which Defendants have no legitimate business, legal, property, or commercial right;
- iv. Domain Names that contain all or a significant portion of Class Plaintiffs' business or personal names; and
- v. Each Deceptive Domain generates revenue that is used, distributed and shared by Defendants, as set forth in the Deceptive Domain Scheme alleged in the FAC.

C. Defendants' use of the Deceptive Domains was done with the bad faith intent to profit in violation of 15 U.S.C. §1125(d)(1)(B)(i), in so much as Defendants had no prior use of the domain names for a bona fide offering of goods or services. See *Victoria's Secret Stores v. Artco Equipment Co., Inc.*, 194 F. Supp. 2d 704, 722 (S.D. Ohio 2002), quoting *E. & J. Gallo Winery v. Gallo Cattle Co.*, 12 U.S.P.Q.2d 1657, 1675 (E.D. Cal. 1989) ("a presumption of bad faith arises in a situation such as this where 'the senior user's trademark is famous in the marketplace and where the junior user was aware of the trademark and of its fame.... In these cases, it is inferrable that the junior user adopted the mark for the purpose of profiting from the aura of goodwill surrounding the senior user's mark.'");

D. Additionally, Defendants intend to divert consumers from Class Plaintiffs' and the Putative Class Members' online location to a site accessible under the Deceptive Domain that could harm Class Plaintiffs' and the Putative Class Members' goodwill, reputation, commercial gain, create a likelihood of confusion as to the source, sponsorship, affiliation, or endorsement of the site, and otherwise damage Class Plaintiffs' and the Putative Class Members' business and property;

E. Defendants routinely offer to transfer, sell, or otherwise assign Deceptive Domains to the mark owner or any third party for financial gain without having used, or having an intent to use, the domain name in the bona fide offering of any goods or services, or the person's prior conduct indicating a pattern of such conduct; .

F. Defendants routinely provide material and misleading false contact information when applying for registration of Deceptive Domains, and/or intentionally fail to maintain accurate contact information;

G. Defendants engage in a widespread scheme that involves the registration, tasting, acquisition, monetization, and use of multiple domain names which the Defendants know are identical or confusingly similar to marks of others that are distinctive and valuable for the express purpose of generating advertising revenue from diverted traffic and confusion;

H. Defendants otherwise act in a manner that demonstrates bad faith intent to commercially profit from the unauthorized use of Deceptive Domains in violation of 15 U.S.C. §1125(d)(1)(B)(i);

I. Defendants' actions in generating, collecting, transacting in, sharing, and distributing the revenue from their unlawful conduct establishes a RICO violation;

J. As alleged in detail in the FAC and the Motions to Dismiss, Defendants' use of the internet, electronic transmission, common electronic programs, mails and wire are among the several predicate acts that are undisputed and will form the foundation for RICO liability;

K. The FAC contains abundant factual allegations supporting and demonstrating a high likelihood of success on each of the alleged legal claims; and

L. The attached screenshots and specific identification of Deceptive Domains (including Defendants' concerted and intentional unauthorized use and monetization of those

Deceptive Domains) is sufficient to establish liability under each Count of the Complaint.

**32. NO ADEQUATE REMEDY AT LAW EXISTS:** The very nature of Class Plaintiffs' and the putative class members' injuries/damages makes it difficult to assess damages associated with loss of goodwill, reputation, prospective business, diverted internet traffic, etc., and, therefore, such damages are considered to have no adequate remedy at law, and to be irreparable (often involving trademark/Lanham Act claims). *See, e.g., Promatek Indus., Ltd. v. Equitrac Corp.*, 300 F.3d 808, 813 (7th Cir. 2002); *Gateway Eastern Ry. Co. v. Terminal R.R. Ass'n of St. Louis*, 35 F.3d 1134, 1140 (7th Cir. 1994). Courts in this Circuit have held likewise for cybersquatting claims. *International Profit Associates, Inc. v. Paisola*, 461 F.Supp.2d 672 (N.D. Ill. 2006). It is obvious that there is no adequate remedy at law for Class Plaintiff Bo Jackson's unauthorized association with lewd, obscene, offensive and pornographic words, images, and advertisements. Without question, the balance of hardships tips in favor of Class Plaintiffs and the Putative Class because the preliminary injunction will essentially merely place the infringing Deceptive Domains on "hold" or "block" the use and monetization of said domains pending trial (at most causing Defendants to lose some advertising revenue that they are not entitled to anyway), whereas failure to issue the injunction will cause Class Plaintiffs and the Class to suffer and incur continued lost goodwill, dilution, embarrassment, loss of reputation, loss of business, and related property, personal and business damage.

**33. THE INJUNCTION WILL NOT HARM THE PUBLIC INTEREST:** The public interest will be served by requiring Defendants to comply with the law and cease and desist making money from the illegal and unauthorized use of Class Plaintiffs' and the putative class members' property. "The public interest is always served by requiring compliance with Congressional statutes such as the Lanham Act and by enjoining the use of infringing marks."

*Quantum Fitness Corp. v. Quantum LifeStyle Centers, L.L.C.*, 83 F. Supp. 2d 810, 832 (S.D. Tex. 1999). Notably, injunction was expressly contemplated by Congress as a remedy for trademark infringement. See 15 U.S.C. §1125(c)(1); *Pet Silk, Inc. v. Jackson*, 481 F. Supp. 2d 824, 834 (S.D. Tex. 2007).

34. Class Plaintiffs understand that this litigation is in its early pre-discovery stages. However, the damage and injuries being sustained by Class Plaintiffs and the putative class members are irreparable in nature. Unfortunately, Defendants refuse to voluntarily cease said conduct and have chosen blatant disregard for the law, in order to reap the financial benefits of their misconduct.

## **VI. CONCLUSION**

35. Defendants are responsible for running their business operations legally, in a manner that complies with federal and state law. Defendants have a duty to design and maintain their programs, systems and operations in a fashion that ensures compliance with the law, respect for the property rights of other citizens, and avoids the taking and use of rights/property that does not belong to Defendants. Like any other business, the responsibility to act legally lies with Defendants. If they cannot run their businesses without myriad ongoing violations, then the internet advertising and monetization aspect of their business must cease. If Defendants are not willing to voluntarily implement the available and appropriate blocking and filtering technologies, or if they posit that such technologies cannot be reasonably employed in their respective current business models/operations, than said operations must end.

## **VII. PRAYER FOR RELIEF**

WHEREAS, Defendants refuse to cease and desist their illegal conduct detailed herein and in the FAC, without Court intervention, Class Plaintiffs respectfully request that this Court

enter a Preliminary Injunction against all Defendants, granting relief as follows:

1. All Defendants ordered to immediately cease and desist tasting, kiting, registration, monetization, sale, trafficking in, cybersquatting, typosquatting, cyberpiracy, and/or other use of Deceptive Domains that infringe on the Class Plaintiffs' and the Putative Class Members' Distinctive and Valuable Marks;
2. Defendant Google ordered to provide the Court with the domain name and associated reports (traffic statistics, revenue statistics, etc.) of every domain name that has displayed Google controlled advertising, participated in its AdSense for Domains program, been used to generate revenue from advertisements, and/or has otherwise been monetized by Google;
3. All other Defendants ordered to provide the Court with the domain name and associated reports (traffic statistics, revenue statistics, etc.) of every domain name under their ownership, license, or control that has displayed Google controlled advertisements, participated in the Google AdSense for Domains program, been used to generate revenue from internet advertisements, and/or has otherwise been monetized by one or more of the Defendants;
4. All Defendants ordered to immediately implement Court-approved, appropriate blocking and filtering technology to prevent use and monetization of Deceptive Domains and the other illegal conduct alleged in the FAC;
5. If one or more of the Defendants cannot implement appropriate blocking and filtering technologies, those Defendants shall be enjoined from all internet advertising and other monetization of any domains until an appropriate blocking and filtering system can be implemented and approved by the Court;
6. Order a constructive trust over all revenue generated by any of the Defendants from the use and/or monetization of Deceptive Domains;
7. Sanction Defendants for their blatant misrepresentations to this Court that they have stopped the registration, use, and monetization of Deceptive Domains that infringe upon Class Plaintiffs;
8. Award reasonable attorneys' fees and costs associated with the filing of this Motion; and
9. Award any and all such other relief as this Court deems just and appropriate.

FOOTE, MEYERS, MIELKE & FLOWERS, LLC

By: /s/ Robert M. Foote  
One of Their Attorneys

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**IN THE UNITED STATES DISTRICT COURT  
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EASTERN DIVISION**

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INTERNET REIT, INC. d/b/a IREIT, INC.,	§	
and JOHN DOES I-X,	§	
	§	
Defendants.	§	

**CERTIFICATE OF SERVICE**

I hereby certify that on January 3, 2008, I electronically filed the foregoing document with the clerk of court for the U. S. District Court, Northern District of Illinois, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means:

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s/Robert M. Foote

## **EXHIBIT “B”**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

VULCAN GOLF, LLC, JOHN B.	§	
SANFILIPPO & SONS, INC.,	§	
BLITZ REALTY GROUP, INC.,	§	
and VINCENT E. "BO" JACKSON,	§	
Individually and on Behalf of All	§	
Others Similarly Situated,	§	Civil Action No. 07 CV 3371
	§	
Lead Plaintiffs,	§	Honorable Blanche M. Manning
v.	§	Magistrate Judge Geraldine Soat Brown
GOOGLE INC., OVERSEE.NET,	§	
SEDO LLC, DOTSTER, INC., AKA	§	
REVENUEDIRECT.COM,	§	
INTERNET REIT, INC. d/b/a IREIT, INC.,	§	
and JOHN DOES I-X,	§	
	§	
Defendants.	§	

**SUPPLEMENT TO PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Class Plaintiffs respectfully submit this Supplement to Plaintiffs' Motion for Preliminary Injunctive Relief, and in so doing states as follows:

1. This supplementary filing is necessitated by Defendants' outrageous conduct since the filing of the original Motion for Preliminary Injunctive Relief, which includes: (1) New registrations, tasting, monetization and other use of Deceptive Domains belonging to and/or infringing on Class Plaintiffs' Distinctive and Valuable Marks, (2) Continued use and monetization of Deceptive Domains identified in the Motion for Preliminary Injunctive Relief and correspondence from Class Counsel; and (3) New monetization with *pornographic* advertisements of Deceptive Domains infringing upon Class Plaintiff JBSS. Defendants have blatantly and willfully engaged in the ongoing unauthorized use and monetization, despite

repeated notice and the January 3, 2008 filing of the Motion for Preliminary Injunctive relief.

**a. Pornographic Monetization**

2. Defendant Google continues to brazenly disregard their obligations to comport with the law. Even after the filing of the Motion for Injunctive Relief, they chose to *expand* their monetization of Deceptive Domains with pornographic advertisements beyond Class Plaintiff Bo Jackson to Class Plaintiff JBSS (Fisher Nuts parent company). Defendant Google monetized the Deceptive Domain www.foshernuts.com (just 1 character deviation from Class Plaintiff JBSS's website www.fishernuts.com) with pornography advertisements. *Copy of Screenshots are attached hereto as Exhibit A.*

3. Defendant Google willfully and intentionally generated revenue from the use and monetization (with pornography ads) of the Deceptive Domain www.foshernuts.com, in blatant disregard for the reputation, goodwill, or interests of Class Plaintiff JBSS.

4. As with Class Plaintiff Bo Jackson, Class Plaintiff JBSS has and is suffering irreparable harm to its reputation, good name, and the goodwill associated with its company by Defendants' monetization of Deceptive Domains with said explicit, offensive, obscene and pornographic advertisements.

5. Class Plaintiff JBSS does not condone the degradation of humans through any form of pornography, explicit, and/or obscene material. Class Plaintiff JBSS's Fisher Nuts is in the wholesome business of selling nut products nationwide. Association with pornography, in any manner, is injurious to its business and reputation.

6. Class Plaintiff JBSS did not grant any of the Defendants any rights, licenses, permission, or otherwise support, condone or accept the association of its products, good name, goodwill, companies, or other business property and assets with the highly offensive, obscene,

pornographic and explicit material and advertisements on monetized Deceptive Domains containing pornography ads.

7. Class Plaintiff JBSS has not been compensated or received any income from the advertisements and obscenities associated with pornography ads on Deceptive Domains.

8. There is no adequate remedy at law for the injury to reputation, goodwill, business, and property that Defendants are causing Plaintiff JBSS by associating its good name with shocking and offensive obscene material.

9. Defendant Google routinely generates revenue from obscene and pornographic internet advertisements placed on Deceptive Domains without the consent or permission of the rightful owner. Its actions against Class Plaintiffs Bo Jackson and JBSS are illustrative of its common and substantially similar misconduct toward millions of putative class members.

10. Without immediate Court intervention, Defendant Google's continued blatant misconduct and disregard for the rights of Class Plaintiffs and the putative class members will unfortunately continue. In fact, Defendant Google's most recent new monetization with pornographic ads of [www.foshernuts.com](http://www.foshernuts.com) is demonstrative of its intentions to continue and expand its unauthorized and illegal conduct.

**b. Deceptive Domains Still In Use and New Deceptive Domains**

11. Defendants continue to use Deceptive Domains contained in the Motion for Injunctive Relief even after the January 3, 2008 filing of the Motion.

12. Defendants further register, taste, kite, monetize and otherwise use New Deceptive Domains subsequent to the January 3, 2008 filing of the Motion for Injunctive Relief, including but not limited to:

<b>Domain Name</b>	<b>Parking Company</b>	<b>Date Registered</b>
vulcaingolf.com	Google/Unnamed	Jan. 10, 2008
wwwblitzrealtygroup.com	Google/Unnamed	Jan. 12, 2008
blitzrealtygroupagents.com	Google/Unnamed	Jan. 12, 2008
Fihsernuts.com	Google/Unnamed	Jan. 15, 2008
jbssiinc.com	Google/Unnamed	Jan. 15, 2008
bojacksoncars.com	Google/Unnamed	Jan. 15, 2008
Fisherntus.com	Google/Unnamed	Jan. 15, 2008
fisshernuts.com	Google/DomainSponsor	Jan. 20, 2008
fisherrnuts.com	Google/DomainSponsor	Jan. 20, 2008
bojacksoncleats.com	Google/Unnamed	Jan. 19, 2008
Fishernurs.com	Google/DomainSponsor	Jan. 20, 2008
foshernuts.com	Google/DomainSponsor	Jan. 20, 2008
foshernuts.com	Google/Unnamed  *note foshernuts.com was used at 2 parking companies Domainsponsor first and then an unnamed parking company for porn ads	
Vulcangolfgifts.com	Google/DomainSponsor	Jan. 20, 2008
bojacksontrainershoe.com	Google/Sedo	Jan. 24, 2008
Bitzrealtygroup.com	Google/Unnamed	Jan. 23, 2008
bojacksonfootballs.com	Google/Unnamed	Jan. 22, 2008
bojacksonbaseballcamp.com	Google/Unnamed	Jan. 21, 2008
bojacksonfootballcamp.com	Google/Unnamed	Jan. 22, 2008
bojacksonsfootballcamp.com	Google/Unnamed	Jan. 21, 2008
boojackson.com	Google/Unnamed	Jan. 23, 2008
fishernutssales.com	Google/DomainSponsor	Jan. 19, 2008
fisherspeanuts.com	Google/DomainSponsor	Jan. 18, 2008
fishernuuts.com	Google/Unnamed	Jan. 24, 2008
mailfishernuts.com	Google/Unnamed	Jan. 23, 2008

### **c. Continued Tasting and Kiting of Deceptive Domains**

13. Defendant Google and the other Defendants continue to “taste,” “kite,” use and monetize tasted domains. Tasting and kiting of domains is a process where Defendant Google and the other Defendants exploit the Add Grace Period (“AGP” is the five day period from registration of a domain where certain registrars can delete a domain at no cost) by registering millions of temporary sites and then monetizing those sites with advertisements.

14. A large majority of the “tasted” and “kited” domains are Deceptive Domains that infringe upon Class Plaintiffs and the putative class members’ Distinctive and Valuable marks. For example, [www.bojacksontrainershoe.com](http://www.bojacksontrainershoe.com) is a Deceptive Domain that Defendant Sedo tasted and, in conjunction with Defendant Google, monetized and shared the resultant revenue.

15. Tasting and kiting allow Defendants to generate revenue (largely from the unauthorized use and monetization of Deceptive Domains) without paying for the Deceptive Domain or maintaining the Deceptive Domain past the AGP period (5 days). By deleting the name during the five day period, Defendants willfully attempt to conceal their connection to the illegal use and monetization of Deceptive Domains.

16. As part of the Deceptive Domain Scheme set forth in the First Amended Complaint (“FAC”), Defendants engage in a domain tasting cycle where the exact same Deceptive Domains are repeatedly tasted, monetized, and deleted. The tasting cycle perpetuates the deception and fraud, and involves generally Defendants’ actions to: register domains, monetize the registered domains for the 5 day AGP period, delete the domains during the AGP period, reregister the exact same domains, remonetize the exact same domains, and again delete the exact same domains during the AGP period. The cycle is ongoing and occurs with respect to millions of domains. Defendants routinely generate revenue and transact in the revenue from said tasting cycle.

17. Defendants generate millions of dollars during each five day period from monetizing tasted domains, many of which are Deceptive Domains. Defendants are using tasting as a lucrative revenue generating component of the Deceptive Domain Scheme set forth in Class Plaintiffs’ First Amended Complaint.

18. Despite Class Plaintiffs' FAC, Motion for Preliminary Injunctive Relief, and requests by Class Counsel to Defendants, Defendants persist in tasting Deceptive Domains. Illustrative of Defendants' ongoing tasting is the list of New Deceptive Domains just since January 3, 2008 set forth in the Chart in Paragraph 11 herein.

19. Class Plaintiffs have requested that Defendants cease use and monetization of tasted domains, cease use and monetization of Deceptive Domains, and have provided Defendants with lists and examples of such. Nevertheless, Defendants continue to use and monetize tasted domains even after Class Plaintiffs' filing of this action, notice to Defendants, and the filing of the Motion for Preliminary Injunctive Relief.

20. Defendants continued conduct even since the filing of the Motion for Preliminary Injunctive Relief, demonstrates that they are committed to continued use and monetization of tasted domains.

21. Defendants should be enjoined from monetizing domains during the five (5) day Add Grace Period ("AGP"). Specifically, Defendants should be enjoined from placing advertisements, or generating revenue from advertisements, on Deceptive Domains that are less than five days old.

**d. Conclusion**

22. In addition to the above lists of Deceptive Domains directly related to Class Plaintiffs, Defendants are continuing to transact in revenue generated from use and monetization of millions of Deceptive Domains adversely impacting all class members.

23. Defendants' continued refusal to block Deceptive Domains from their respective systems, continued monetization and transaction in revenue derived from Deceptive Domains,

and Defendants' unwillingness to take reasonable action to prevent further violations demonstrates the willfulness of their conduct and necessity for injunctive relief.

24. Defendants each have an affirmative duty to operate their respective businesses legally. If Defendants cannot engage in a particular business activity without violating the law, then said business activity must cease. In this instance, if Defendants cannot engage in the business of "internet advertising" without the blatant and widespread exploitation, use and monetization of Deceptive Domains that belong to/infringe upon the rights and property of Class Plaintiffs and the putative class, then Defendants have no option but to stop internet advertising. Defendants bear the duty and obligation to run their businesses legally and with respect for the rights and property of other businesses, individuals, and entities.

WHEREFORE, Class Plaintiffs respectfully request that this Court enter a Preliminary Injunction against all Defendants, granting relief as follows:

- a. Enjoining Defendants from placement of advertising on, use, monetization, and/or conduct resulting in the generation of revenue on domains less than five (5) days old;
- b. All Defendants ordered to immediately cease and desist tasting, registration, monetization, sale, trafficking in, or other use of Deceptive Domains that infringe on the Class Representatives' and the Putative Class Members' Distinctive and Valuable Marks;
- c. Defendant Google ordered to provide the Court with the domain name and associated reports (traffic statistics, revenue statistics, etc.) of every domain name (including "tasted domains") that has displayed Google controlled advertising, participated in its AdSense for Domains program, or otherwise been used to generate revenue from advertisements;
- d. All other Defendants ordered to provide the Court with the domain name and associated reports (traffic statistics, revenue statistics, etc.) of every domain name that they have tasted, kited, are under their ownership, license, or control, or that they have received any revenue from the displayed of Google controlled advertisements, participated in the Google AdSense for Domains program, or has otherwise been used to generate revenue from internet advertisements;

- e. All Defendants ordered to immediately implement Court-approved, appropriate blocking and filtering technology to prevent use and monetization of Deceptive Domains;
- f. If one or more of the Defendants cannot implement appropriate blocking and filtering technologies, enjoin those Defendants from all internet advertising until an appropriate blocking and filtering system can be implemented;
- g. Order a constructive trust over all revenue generated by any of the Defendants from the monetization of Deceptive Domains;
- h. Sanction Defendants for their blatant misrepresentations to this Court that they have stopped the registration, use, and monetization of Deceptive Domains that infringe upon Class Plaintiffs;
- i. Award reasonable attorneys' fees and costs for the filing of this Motion; and
- j. Award any and all such other relief as this Court deems just and appropriate.

Respectfully Submitted,

By: /s/ Robert M. Foote  
One of Their Attorneys

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

VULCAN GOLF, LLC, JOHN B.	§	
SANFILIPPO & SONS, INC.,	§	
BLITZ REALTY GROUP, INC.,	§	
and VINCENT E. "BO" JACKSON,	§	
Individually and on Behalf of All	§	
Others Similarly Situated,	§	Civil Action No. 07 CV 3371
	§	
Lead Plaintiffs,	§	
	§	Honorable Blanche M. Manning
v.	§	
	§	Magistrate Judge Geraldine Soat Brown
GOOGLE INC., OVERSEE.NET,	§	
SEDO LLC, DOTSTER, INC., AKA	§	
REVENUEDIRECT.COM,	§	
INTERNET REIT, INC. d/b/a IREIT, INC.,	§	
and JOHN DOES I-X,	§	
	§	
	§	
Defendants.	§	

**CERTIFICATE OF SERVICE**

I hereby certify that on January 25, 2008, I electronically filed the foregoing document with the clerk of court for the U. S. District Court, Northern District of Illinois, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means:

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s/Robert M. Foote

## **EXHIBIT “C”**



## **EXHIBIT “D”**

## Christi Spring

**From:** Christi Spring on behalf of Robert Foote  
**Sent:** Monday, August 13, 2007 2:21 PM  
**To:** 'Michael Page'; 'dockterman@wildman.com'; 'satlee@winston.com'; 'Held, Kenneth'; 'jsinger@smsm.com'  
**Cc:** Robert Foote; 'GKEG4@aol.com'; Kathleen Chavez; Mark Bulgarelli  
**Subject:** Vulcan Golf v. Google et al.  
**Attachments:** Vulcan Golf Domain Names.doc

Dear Counsel:

Attached is a list of domain names that we would like blocked. It is our understanding that you will comply with our request to get these names off of your system. As stated in our meeting, we are hopeful that this will avoid our need to seek injunctive relief from the court. This list is not intended to be all inclusive, and we will follow up with any supplements to this list as needed. Thank you very much for your cooperation.

Very truly yours,  
Robert M. Foote

## **EXHIBIT “E”**

http://vulgangolfclubs.com/ - Microsoft Internet Explorer

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Tuesday, September 11, 2007

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Tuesday, September 11, 2007

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## **EXHIBIT “F”**

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Address http://www.cnomy.com/?dn=vulcongolf.com&pid=1P0816841&prvtot=8bZ/kUqRxDeDywRCuwgbMMDich8Co+NOb&EAg9ZOUl52REZXElqQk1kwTtJmcKckW6oNKWdo12rX3 Links >

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Done Wednesday, October 17, 2007

/ start 5:16 AM

## **EXHIBIT “G”**



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• Bo Jackson Baseball Cards	• 49ers Redskins

About Us

BoJacksonCars.com is a website dedicated to the life and career of Bo Jackson. We provide information on his football and baseball careers, as well as his personal life and interests. We also offer a variety of products related to Bo Jackson, including photos, memorabilia, and apparel.

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Monday, January 14, 2008

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Popular Destination

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• <a href="#">Golf Club Rental</a>	• <a href="#">Kendleshire Golf Club</a>
• <a href="#">International Golf Club</a>	• <a href="#">Bellry Golf Club</a>
• <a href="#">Burhill Golf Club</a>	• <a href="#">Links Golf Club</a>

About Us

We empower individuals, organizations and businesses with our unique services. Diversification being our core strategy, we specialize in [Trump International Golf Club](#), [City Golf Club](#), [Golf Club Clones](#) and an array of other services. Our mission is to provide quality resources.

Done start http://vulcaingolf.co... Monday, January 14, 2008 8:42 AM

fishernutssales.com - Microsoft Internet Explorer

File Edit View Favorites Tools Help

Address: http://searchportal.information.com/index.mes?epi=00760076VFAXVE0DWlgVVRBeVwMAFQVbcIYKWIkADFAIXFHVQBHWhdMSH2SWARDTABXCEBSP10CCdNDIZW

**Fishernutssales.com**  
What you need, when you need it

Search this site:

**Hot**

- ①Nut
- ①Nuts
- ①Business Leads
- ①Home Sales
- ①Boats For Sale
- ①Sell Home
- ①Self Publishing
- ①Pay Per Click Program
- ①Postcard Printing

**Popular**

- Real Estate Agent④
- Customer Service④
- Real Estate④
- Wholesale Gift④
- Real Estate Marketing④
- Make Money Online④

---

**Fishernutssales.com favorites:** Wholesale Gift | Real Estate Marketing | Make Money Online | Pay Per Click | Houses | Business Opportunity

[Bookmark this page](#) | [Make this your homepage](#)

Done Tuesday, January 22, 2008

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Bojacksonfootball.com - Mozilla Firefox

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Bojacksonfootball.com

What you need, when you need it.

English

Hot

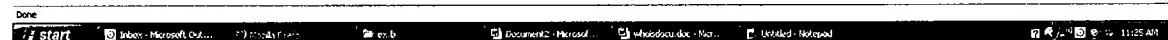
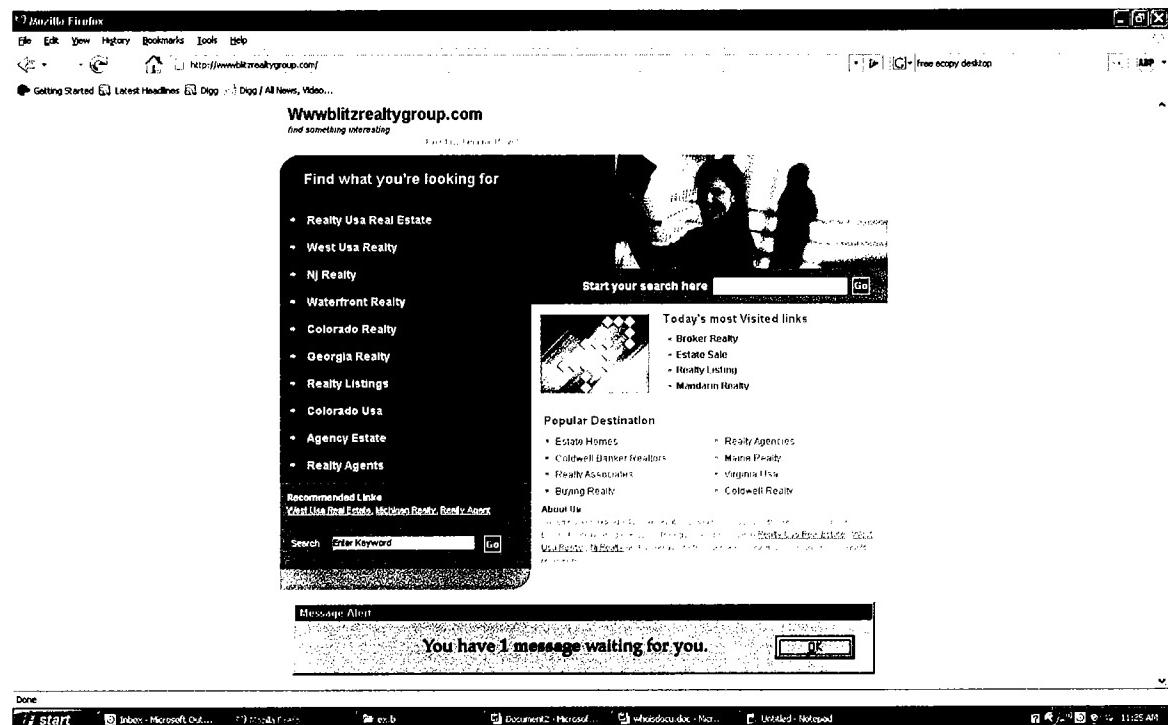
- ① Throwback Jerseys
- ② Football
- ③ Video Poker
- ④ Gambling
- ⑤ Balls
- ⑥ Poker
- ⑦ Sportsbook

Bojacksonfootball.com favorites:

Search this site:

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search the web for bojacksontrainershoe.com - Mozilla Firefox

File Edit View History Bookmarks Tools Help

Getting Started Latest Headlines Digg Digg / All News, Video...

bojacksontrainershoe.com

All Jordan Shoes, \$59.60  
Brand New Jordan Shoes W/ Original Box & Retro Card. Free Shipping!  
[www.KicksFly.com/Jordan](http://www.KicksFly.com/Jordan)

Nike Air Max at Eastbay  
Shop Nike Air Max Shoes At Eastbay! New & Retro Styles From 1987 - 2006  
[www.Eastbay.com](http://www.Eastbay.com)

Womens Max Air Shoes  
Slip into Womens max air shoes. Hot Fashions at Prices You Want!  
[Shopzilla.com NikeAirMax](http://Shopzilla.com/NikeAirMax)

Find Cortez shoe  
7,000+ Shoes. Find Discounts. Shop for Shoes by Color & Design  
[like.com Nike](http://like.com/Nike)

Dunks, Court Force & More  
Shop Sneakers for Men & Women Get Unique Sneakers at Urban  
[www.UrbanOutfitters.com](http://www.UrbanOutfitters.com)

plush trainer shoe  
adidas Shoes - Footwear for Active Men, Women & Kids. Shop Now!  
[www.shopadidas.com](http://www.shopadidas.com)

Shoe Carnival  
Find, compare & buy Shoes Compare & Buy from 1000's of Stores  
[www.ShoeCarnival.com/Shoes](http://www.ShoeCarnival.com/Shoes)

Trademark Contact | Contact

Related Searches

- Bo Jackson Cross Trainer
- Kicks Shoe
- Nike Air Max
- Nike Basketball Shoe
- Nike Cross Trainer Pro
- Trainer Turf
- Nike Sneaker
- Air Diamond Trainer
- X Trainer Shoe
- Retro Nikes

Done

/ start    [ ] inbox - Microsoft Out...    [ ] search the web for...    [ ] ex.b    [ ] proposal    [ ] Document2 - Microsoft...    [ ] 12.3.07 Exhibit B to H...    [ ] Untitled - Notepad    [ ] 11:31 AM

Fishernuts.com - Mozilla Firefox

File Edit View History Bookmarks Tools Help

Getting Started Latest Headlines Digg Digg / All News, Video...

Fishernuts.com

What you need, when you need it

English ▾

Hot

- Gourmet Popcorn
- Gift Baskets
- Flowers
- Gourmet Gift Basket
- Football Tickets
- Wholesale Gift
- Christmas Gift Basket
- Free Recipe
- Dallas Mavericks Ticket

Popular

- Funeral Flowers
- Pet Products
- Cheap Laptop
- Oil Paintings
- Wedding Favors
- Basketball Tickets

---

Fishernuts.com favorites: Oil Paintings | Wedding Favors | Basketball Tickets | Free Recipes | Diamonds | Recipes

Done

start

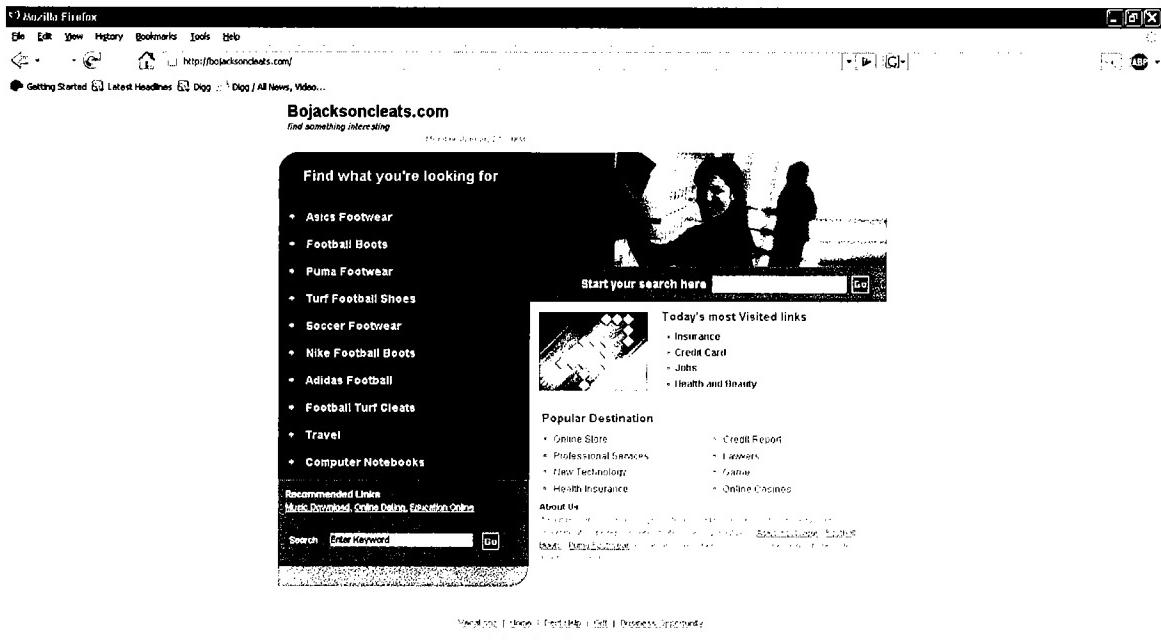
Inbox - Microsoft Outlook

Documents - Microsoft Word

Untitled - Notepad

Monday, January 21, 2008

1:50 PM



vulcangolfgifts.com - Mozilla Firefox

File Edit View Bookmarks Tools Help

Getting Started Latest Headlines Digg Digg / All News, Video...

Vulcangolfgifts.com

What you need, when you need it

English ▾

Search This Site...

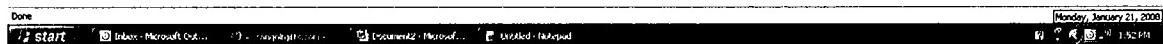
**Hot**

- [Discount Golf Clubs](#)
- [Discount Golf Equipment](#)
- [Golf Equipment](#)
- [Gift Cards](#)
- [Golf Clubs](#)
- [Unique Gift](#)
- [Online Store](#)
- [Golf Training Aids](#)
- [Gift Certificates](#)

**Popular**

- [Home Decor](#)
- [Gift Card](#)
- [Running Shoes](#)
- [Baby Shower Gift](#)
- [Gift Baskets](#)
- [Online Book Store](#)

Vulcangolfgifts.com favorites: Baby Shower Gift | Gift Baskets | Online Book Store | Christmas Gift Basket | Online Shopping | Garden Decor



1 Mozilla Firefox

File Edit View History Bookmarks Tools Help

Getting Started Latest Headlines Digg Digg / All News, Video...

Bojacksonsfootballcamp.com

Find something interesting

Find what you're looking for

- Varsity Cheerleaders
- Miami Cheerleaders
- Ucla Schedule
- Camp Cheerleaders
- Nba Cheerleaders
- Ucla Jersey
- Ucla Recruiting
- Cheerleaders High School
- Ucla University
- Cheerleaders Team

Start your search here  Go

Today's most Visited links

- Ucla Lacrosse
- Football Cheerleaders
- Ucla Athlete
- Ucla Tickets

Popular Destinations

- NakedCheerleaders
- Ucla Bruins
- Ucla Cheerleading
- Cheerleaders Cheers
- Ucla Football Schedule
- Ucla Volleyball
- Ucla Notre Dame
- Ucla Team

Search  Enter Keyword

Ucla Football | Ucla Cheerleaders | Camp Cheerleaders | Ucla Cheer | Ucla Dance | Ucla Dodge  
Digg this page | Add to your homepage

Tuesday, January 22, 2008

fishernuts.com - Windows Internet Explorer

http://searchportal.information.com/index.mastep=01040092UNPVALXJMIVSFURYCOYNGCEDRHCdGTTFFZWACSwIRXTpSXQWdgodONNDXRIBI1FA1VZDAYDgjAGUQUE

Fishernuts.com

What you need, when you need it.

Search  Search

Related Searches

- ① Gourmet Gift Basket
- ① Gourmet Popcorn
- ② Gift Baskets
- ② Flowers
- ② Wholesale Gift
- ② Flowers Online
- ② Kitchen
- ② Football Tickets
- ② Christmas Gift Basket

Related Searches

- Free Recipe ④
- Self Publishing ④
- Business Leads ④
- Bar Stools ④
- Food Storage ④
- Container
- Oil Paintings ④

---

Related Searches: Bar Stools | Food Storage Container | Oil Paintings | Online Shopping | Unique Gift | Recipes

Feedback and suggestions are welcome. Contact us.

Done

Start | Inbox - Microsoft Out... | Documents - Microsoft... | public on my PC (F:) | Search Results | TECH | Internet | Wednesday, May 07, 2008 | 141 PM

fisherspeanuts.com - Windows Internet Explorer

http://fisherspeanuts.com

Internet Explorer cannot display this page

fisherspeanuts.com

Fisherspeanuts.com  
What you need, when you need it

Search

Related Searches:

② Peanut	④ Childrens Toys
② Gourmet Popcorn	④ Apply For Credit
② Gift Baskets	Card
② Christmas Gift	Free Xbox 360
Basket	④ Wedding Favors
② Gourmet Gift Basket	④ Baby Toys
② Send Flowers	Toy Store
② Wholesale Gift	
② Flowers Online	
② Flower Delivery	

Related Searches: Wedding Favors | Baby Toys | Toy Store | Educational Toys | Lg Phone | Credit Card Applications | Make an offer

Done

Start Internet Wednesday, May 07, 2008

Inbox - Microsoft Out... Document1 - Microsoft... public on 'main02' (F:) Search Results TECH fisherspeanuts.com ... 1:39 PM

**Find what you're looking for**

- + [Ltd Group](#)
- + [Group Insurance](#)
- + [Analyst Group](#)
- + [Investor Company](#)
- + [Goldman Sachs Group](#)
- + [Securities Group](#)
- + [Group Finance](#)
- + [Fund Investor](#)
- + [Group Financial Services](#)
- + [Lic Group](#)

**Recommended Links**  
[Investor Real Estate](#), [Lic Group](#), [Lic Realty](#)

Search

Start your search here



**Today's most Visited links**

- + [Realty Realtor](#)
- + [Strategic Group](#)
- + [Sec Group](#)
- + [Company Group](#)

**Popular Destination**

- |  |                                      |
|--|--------------------------------------|
| + <a href="#">Group Communications</a> | + <a href="#">Real Estate Realty</a> |
| + <a href="#">Global Group</a>         | + <a href="#">Broker Realty</a>      |
| + <a href="#">Financial Investor</a>   | + <a href="#">Group Mortgage</a>     |
| + <a href="#">Michael Group</a>        | + <a href="#">Asset Group</a>        |

**About Us**

We empower individuals, organizations and businesses with our unique service. By diversifying their core strategy, we specialize in [Ltd Group](#), [Group Insurance](#), [Analyst Group](#) and an array of other services. Our mission is to provide quality resources.

[Investor Real Estate](#) | [Realtors Realty](#) | [Lic Group](#) | [Geo Group](#) | [Global Investor](#)

[Bookmark this page](#) | [Make this your Homepage](#)

http://fishernutscompany.com/ - Microsoft Internet Explorer

File Edit View Favorites Tools Help

Back Favorites Address http://fishernutscompany.com/ Links >

Fishernutscompany.com  
find something interesting

Tuesday, November 27, 2007

Find what you're looking for

- + Fisher Scientific Catalog
- + Fisher Chemicals
- + Fisher Catalog
- + Fisher Scientific Msds
- + Fisher Science
- + Fisher Scientific Company
- + Fisher Safety
- + Fisher Msds
- + Fisher Scientific Co
- + Fisher International

**Recommended Links**  
[Fisher Company](#) [Fisher Scientific Chemical](#) [Lab Supplies](#)

Search  Go

  
Start your search here  Go

Today's most Visited links

-  Scientific Supplies
- Scientific Science
- Fisher Scientific Laboratory
- Scientific Supply

Popular Destination

- + Fisher Scientific Lab
- + Scientific Products
- + Scientific Equipment
- + Laboratory Scientific
- + Travel
- Computer Notebooks
- Music Download
- Online Dating

About Us

We empower individuals, organizations, and businesses with our products, services, and expertise. Our mission is to provide outstanding products and services to our customers. We strive to be a leader in the industry by providing quality products and services.

Tuesday, November 27, 2007

start http://fishernutscom... 6:38 AM

Car Finance, Bo Jackson Sneakers, Bo Jackson injury - bojacksoninjury.com - Microsoft Internet Explorer

File Edit View Favorites Tools Help

Back Favorites

Address: http://19searchfeed.com/?o=qgf45yhq38&u=bojacksoninjury.com

bojacksoninjury.com

SEARCH:  GO

Top Features

- » **Car Finance**
- » **Bo Jackson Sneakers**
- » **Bo Jackson injury**
- » **Michael Vick**
- » **Ray Lewis**
- » **Randy Moss**
- » **Ricky Williams**
- » **Barry Sanders**
- » **Football Jersey**

In Focus

- » Walter Payton
- » Deion Sanders
- » OJ Simpson
- » Larry Bird
- » Joe Montana
- » Jerry Rice

Popular Picks

- » Wilt Chamberlain
- » Jim Brown
- » Julius Erving
- » Marcus Allen
- » Priest Holmes
- » Earl Campbell

Saturday, December 01, 2007

start Document2... Search Results... Infinigem... Car Finance... Document1... 7:10 AM

vulkangolf.com - Microsoft Internet Explorer

File Edit View Favorites Tools Help

Address: http://searchportal.information.com/index.mas?epi=00490068UVSPWALXVUMV8VTQkNUG9TCVsFG1QODBNUZ1FQDFEGAUP

Links >

**Vulkangolf.com**  
What you need, when you need it

Search this site:

*Hot*

- ①Golf
- ①Kangol
- ①Golf Gift
- ①Golf Ball
- ①Golf Club
- ①Golf Course
- ①Golf Equipment
- ①Golf Accessory
- ①Golf Vacation

*Popular*

- Golf Shirt②
- Golf Bag②
- Golf Store②
- Hole In One Insurance②
- Nike Golf Ball②
- Golf Apparel②

Vulkangolf.com favorites: Hole In One Insurance | Nike Golf Ball | Golf Apparel | Gift | Callaway Golf Balls | Discount Golf Clubs

Document last saved: 11/27/2007 8:23:39 AM

Sunday, December 02, 2007

/ start    Inbox - Outlook Express    vulkangolf.com - Microsoft Internet Explorer    http://ads.revenue...    7:22 PM

https://vulgangolf.com/ - Microsoft Internet Explorer

Address: http://vulgangolf.com/

Vulgangolf.com  
find something interesting

Thursday, November 22, 2007

Find what you're looking for

- Custom Golf Clubs
- Golf Fermitgliedschaft
- Ge
- Dit
- Algan
- Golf Gift
- Thin Film
- Azur Expeditions
- Germanium
- Golftbäle

Recommended Links

Um. UV. Golf Services

Search: Enter Keyword Go

Start your search here

Today's most Visited links

- Callaway Golf Clubs
- Band Gap
- Golf School
- Golf Trolley

Popular Destination

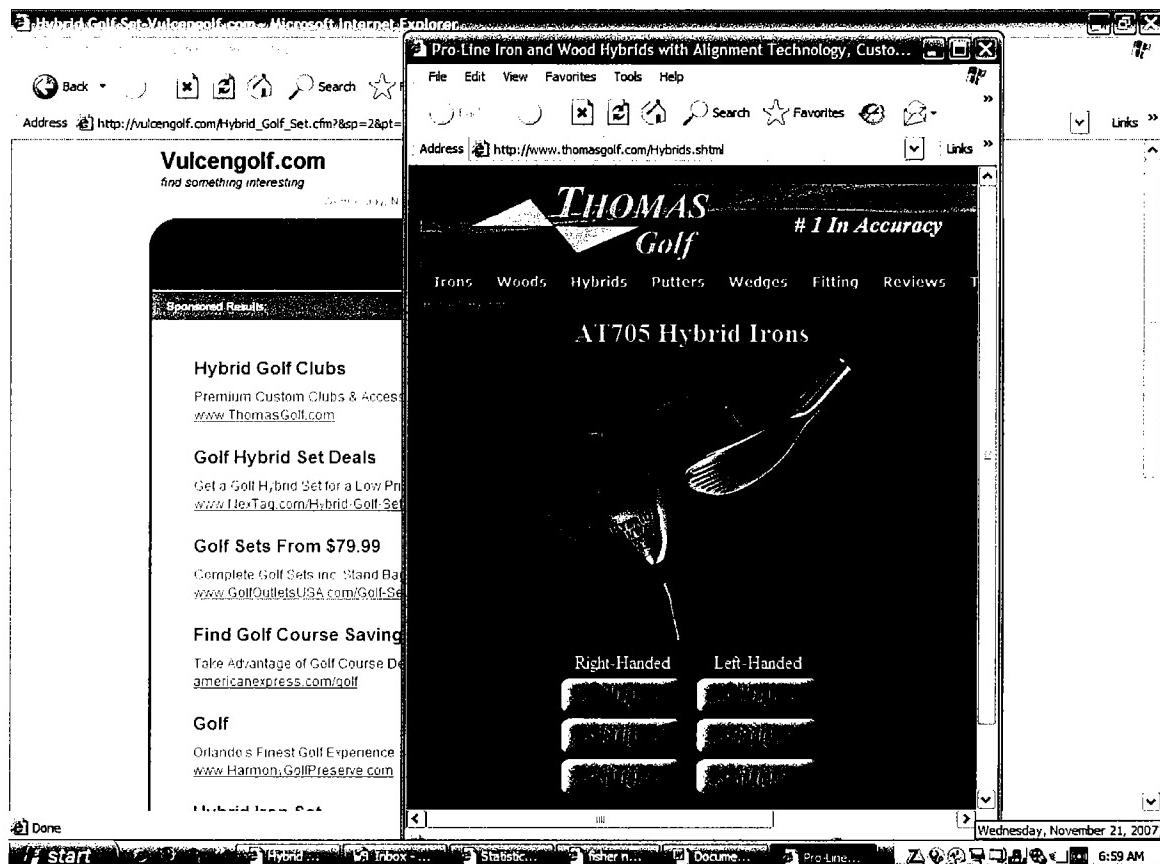
- Golf Schools
- Emitting
- Golf Packages
- Telecon
- Vulnerability Test
- Thin Film Coating
- Kunt U
- Vul Machine

About Us

We serve over individuals, organizations and businesses worldwide. Our unique service diversification brings our customers what we specialize in: **Custom Golf Clubs**, **Golf Fermitgliedschaft**, **Ge** and many other services. Our business is to offer the highest quality resources.

Thursday, November 22, 2007

start WHOIS domain reg... http://vulgangolf.co... 6:16 AM



http://vulcngolf.com/ - Microsoft Internet Explorer

File Edit View Favorites Tools Help

Back Home Search Back Forward Stop Links »

Address http://vulcngolf.com/

Vulcngolf.com  
find something interesting

Wednesday, November 21, 2007

**Find what you're looking for**

- + Little Tikes Golf Set
- + Totsports Golf Set
- + Golf Practice Set
- + Golf Desk Set
- + Golf Barbecue Set
- + Golf Putting Set
- + Golf Barbeque Set
- + Golf Gift Set
- + Teen Golf Set
- + Snoopy Golf Set

**Recommended Links**

Golf Chess Set, Kit Golf Set, Golf Putter Set

Search  Go

**Start your search here**  Go

**Today's most Visited links**

Golf Set  
 Hybrid Golf Set  
 Hybrid Golf Club Set  
 Junior Golf Set

**Popular Destination**

+ Callaway Golf Club Set	+ Junior Golf Club Set
+ Sel Fern Golf	+ Golf Irons Set
+ Golf Set For kids	+ Ladies Golf Club Set
+ Child Golf Set	+ Kids Golf Club Set

About Us

We strive to provide you with the best golf sets available. Our mission is to offer you the best selection by using our online strategy. We specialize in [Little Tikes Golf Set](#), [Totsports Golf Set](#), [Golf Practice Set](#) and many more golf sets. Our website is designed to provide quality resources.

Wednesday, November 21, 2007

start http://vulcngolf.com/ My Inbox - Out... Statistics fo... Fisher nu-D... Documenti... 6:54 AM

xxxbojackson.com - Microsoft Internet Explorer

File Edit View Favorites Tools Help

Back Favorites Address http://searchportal.information.com/index.mas?epi=00510041UVsPWVALXUMV8bQ80EXAtBVwQWIPAlpYHlrVAEIAFEOOII

Links »

**Xxxbojackson.com**  
What you need, when you need it

Search this site:

*Hot*

- ① Jackson
- ① Jackis
- ① Sony
- ① Tack
- ① Xbox
- ① Electric Guitar
- ① Racks
- ① Guitar
- ① Boise

*Popular*

**Musical Instrument**   
**Music Store**   
**Keyboards**   
**Acoustic Guitar**   
**Amplifier**   
**Amps**

---

Xxxbojackson.com favorites: Acoustic Guitar | Amplifier | Amps | Flute

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http://blitzrealtygrup.com/ - Microsoft Internet Explorer

File Edit View Favorites Tools Help

Address http://blitzrealtygrup.com/ Links »

Blitzrealtygrup.com  
find something interesting

Thursday, November 29, 2007

**Find what you're looking for**

- + Commercial Mortgage Loan
- + Commercial Mortgages
- + Commercial Mortgage
- + Commercial Real Estate Loan
- + Commercial Property Loan
- + Commercial Loans
- + Commercial Mortgage Lender
- + Commercial Mortgage Loans
- + Commercial Mortgage Lenders
- + Commercial Real Estate Loans

**Recommended Links:**  
[Commercial Real Estate Loan Info](#), [Commercial Mortgage Lender](#), [Commercial Real Estate Lender](#)

Search Enter Keyword Go

**Start your search here** Go

**Today's most Visited links**

- Commercial Real Estate Lenders
- Commercial Lenders
- Commercial Mortgage Broker
- Commercial Lending

**Popular Destination**

- Commercial Real Estate Mortgage
- Commercial Lender
- Commercial Real Estate Lending
- Commercial Real Estate Financing
- Commercial Property; Loans
- Commercial Loan
- Commercial Property; Lenders
- Business Loans

**About Us**

We provide individuals, organizations and business with commercial real estate financing. Our goal is to be your one stop shop for all your financing needs.

Our slogan is being our core strategy, we specialize in [Commercial Mortgage Loan](#), [Commercial Mortgages](#), [Commercial Mortgage](#) and a variety of other financing that

Thursday, November 29, 2007

start WHOIS domain regist... Document2 - Microsoft... http://blitzrealtygrup... 10:27 AM

A screenshot of the Buyfishernuts.com website as it appears in Microsoft Internet Explorer. The page features a black header bar with the URL 'http://buyfishernuts.com/' and a standard Windows-style toolbar. Below the header is a navigation menu with links like 'File', 'Edit', 'View', 'Favorites', 'Tools', and 'Help'. A search bar with a magnifying glass icon and a 'Favorites' button are also present. The main content area has a white background. At the top left, there's a sidebar with a list of links such as 'Christmas Nuts', 'Buy Nuts Online', and 'Fisher Theater Detroit'. To the right of this sidebar is a large, blurry image of two people in what looks like a theater or auditorium setting. In the center of the page is a search bar with the placeholder text 'Start your search here' and a 'Go' button. Below the search bar is a section titled 'Today's most Visited links' with a list including 'Loaded', 'Paul Fisher', 'Buy Car', and 'Almonds'. Further down is a section titled 'Popular Destination' with links like 'Fisher And Paykel', 'Kim Fisher', 'Helen Fisher', 'Irving Fisher', 'Buy To Let Mortgage', 'Buy Stock', 'Deluxe Mixed Nuts', and 'Mel Fisher'. At the bottom of the page is an 'About Us' section with a brief description of the company's mission to empower individuals, organizations, and businesses with unique solutions. The footer contains a 'start' button and a status bar showing the date and time.

A screenshot of a Microsoft Internet Explorer window displaying the BojacksonXXX.com website. The page features a large banner image of a woman in lingerie. On the left, there's a sidebar with links like 'Find what you're looking for' and 'Recommended Links'. The main content area has sections for 'Today's most Visited links' and 'Popular Destination'. At the bottom, there's a search bar and a navigation bar with links to 'Inbox - Outlook Express' and 'Document1 - Microsoft...'. The status bar at the bottom shows the date as Sunday, December 02, 2007.





A screenshot of the BoJacksonpics.com website as viewed in Microsoft Internet Explorer. The page features a black header bar with the URL 'http://bojacksonpics.com' and standard browser menu options like File, Edit, View, Favorites, Tools, and Help. Below the header is a toolbar with icons for Back, Forward, Stop, Home, Search, and Favorites. The main content area has a white background. At the top left, there's a search bar with placeholder text 'Search' and a 'Favorites' button. To the right of the search bar is a large, blurry image of a woman with long dark hair. On the left side of the main content area, there's a sidebar with a list of recommended links: 'Sports Memorabilia', 'Dragonball Z Ccg', 'Dragonball Z Figure', 'Dragonball Z Toy', 'Dragonball Z Music', 'Dragonball Z Game', 'Dragonball X', '3 Dragonball', 'Www Dragonball', and 'Dragonball Z Action Figures'. Below this list is a section titled 'Recommended Links' containing 'Dragonball', 'Travel', 'Computer', and 'Notebooks'. At the bottom of the sidebar is a search bar with placeholder text 'Enter Keyword' and a 'Go' button. The main content area also features a 'Start your search here' input field and a 'Go' button. To the right of the search fields is a section titled 'Today's most Visited links' with a list including 'Music Download', 'Online Dating', 'Education Online', and 'Insurance'. Below this is a section titled 'Popular Destination' with two columns of links: 'Credit Card', 'Jobs', 'Health and Beauty', 'Online Store' on the left, and 'Professional Services', 'New Technolog', 'Health Insurance', and 'Credit Report' on the right. At the very bottom of the page, there's a footer with a 'About Us' link and a paragraph about the site's mission to empower individuals, organizations, and businesses with unique services. The footer also includes a copyright notice for Tuesday, December 04, 2007, and a link to 'Sports\_Memorabilia'. The status bar at the bottom shows the URL 'http://bojacksonpics....' and the system date and time.

http://bojacksonnude.com/ - Microsoft Internet Explorer

File Edit View Favorites Tools Help

Back Favorites Address: http://bojacksonnude.com/ Links >

**Bojacksonnude.com**  
find something interesting  
Thursday, November 29, 2007

**Find what you're looking for**

- + Breast
- + Adult
- + Big Tits
- + Adult Dating
- + Phone Sex
- + Boobs
- + Tits
- + Video
- + Videos
- + Cam Girls

**Recommended Links**  
[Webcam, Babes, Models](#)

Search  Go

**Start your search here**  Go

**Today's most Visited links**

- Stripper
- Female Stripper
- Trish Stratus Nude
- Adult Entertainment

**Popular Destination**

- Strip	- Women
- Nude Patch	- Lingerie
- Live Girls	- Strip Club
- Nude Art	- Adult Dancer

**About Us**  
We empower individuals, organizations and businesses with our unique service.  
Our diversification is our core strategy. We operate in the [Breast](#), [Adult](#), [Big Tits](#) and an array of other services. Our mission is to provide quality resources.

Done start WHOIS domain regist... Microsoft Word http://bojacksonnude... Thursday, November 29, 2007 10:36 AM

Mozilla Firefox

File Edit View History Bookmarks Tools Help

http://fishernuts.com/

Getting Started Latest Headlines Digg Digg / All News, Video...

Fishernuts.com

Find something interesting

Find what you're looking for

- Macadamia Nuts
- Emerald Nuts
- Ser U
- Dulero Ser
- Macadamia Nuts
- Dried Fruit
- Babel Fish
- Ser Estar
- Quem Quer Ser Millonario
- Rne

Recommended Links

Hockey Tournament, Go Nuts, Dallas Mixed Nuts

Search Enter Keyword Go

Start your search here

Today's most Visited links

- Ser Humano
- Juego De Quién Quiere Ser Millonario
- Cope
- Ser Madrid

Popular Destination

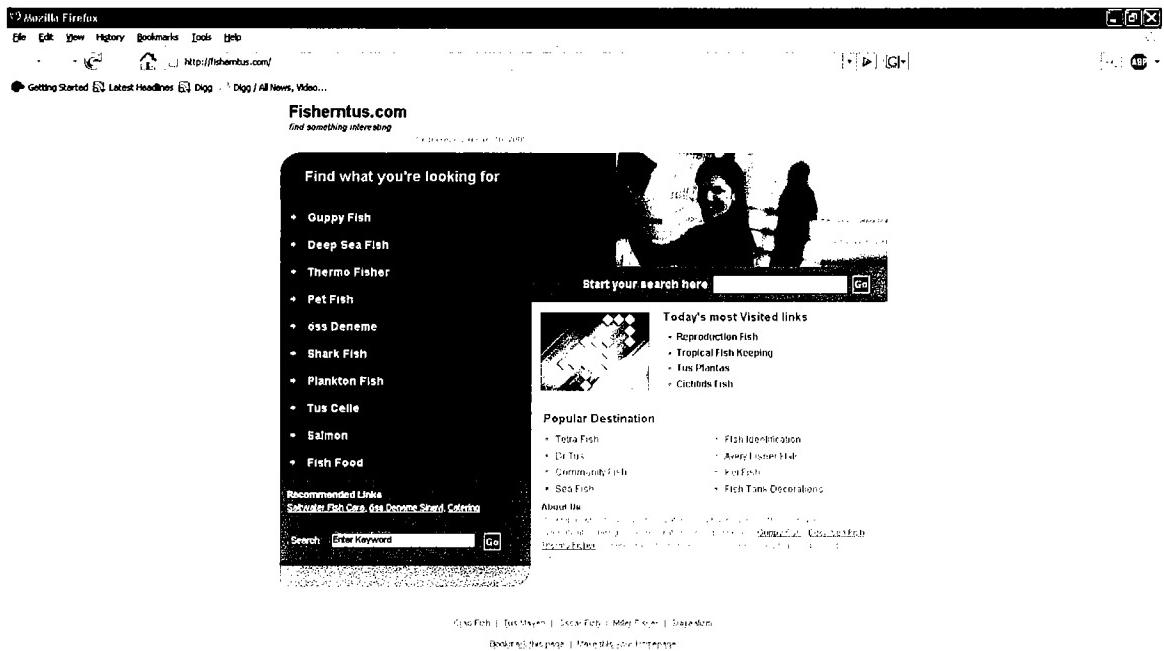
- Tops Nut
- Ser Es
- Gourmet Nuts
- Nuts Online
- Hockey Teams
- Nuts For Sale
- Nuts Site
- Ser Mejor

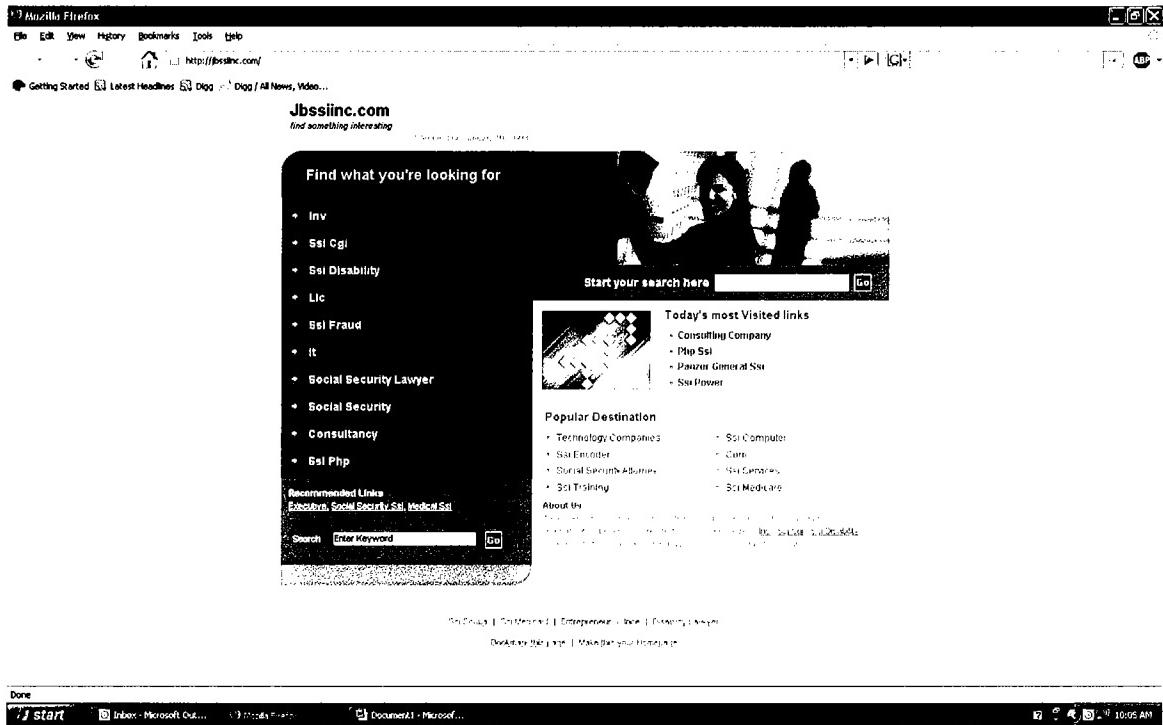
About Us

Privacy Policy | Advertise | Contact | Sitemap | Feedback | RSS

Feedback page | Set as your homepage







## **EXHIBIT “H”**



What you need, when you need it

Related Searches

- Gift Cards
- Gift Certificates
- Gift Baskets
- Christmas Gift Basket
- Gourmet Gift Basket
- Unique Gift
- Wholesale Gift
- Gift Card
- Flowers Online

Related Searches

- Flowers
- Baby Shower Gift
- Gourmet Popcorn
- Home Decor
- Send Flowers
- Baby Toys

Related Searches

- Flowers
- Baby Shower Gift
- Gourmet Popcorn
- Home Decor
- Send Flowers
- Baby Toys

Related Searches: Home Decor | Send Flowers | Baby Toys | Wedding Favors | Personalized Gift | Flower Delivery

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*What you need, when you need it*

[Throwback Jerseys](#)   [Baseball Memorabilia](#)   [Football Jerseys](#)   [NFL Apparel](#)

[Basketball Jersey](#)   [Basketball Tickets](#)   [Football Jersey](#)   [Basketball Uniforms](#)

[Basketball Memorabilia](#)   [NFL Jersey](#)   [NFL Apparel](#)

[Football Jersey](#)   [NFL Jersey](#)   [NFL Apparel](#)

#### Related Searches

- [Throwback Jerseys](#)
- [Baseball Memorabilia](#)
- [Football Jerseys](#)

#### Related Searches

- [Throwback Jersey](#)
- [Baseball Memorabilia](#)
- [Football Jersey](#)

#### Popular Categories

- |   |                                    |                                      |
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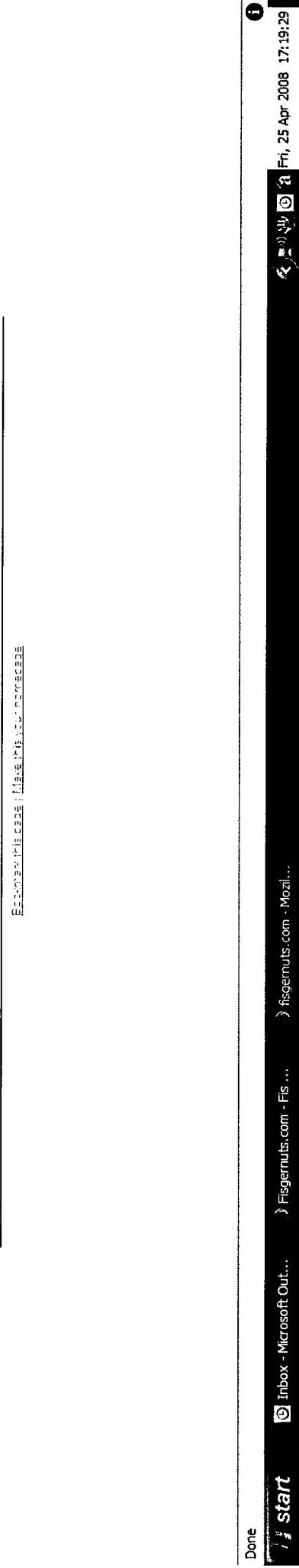
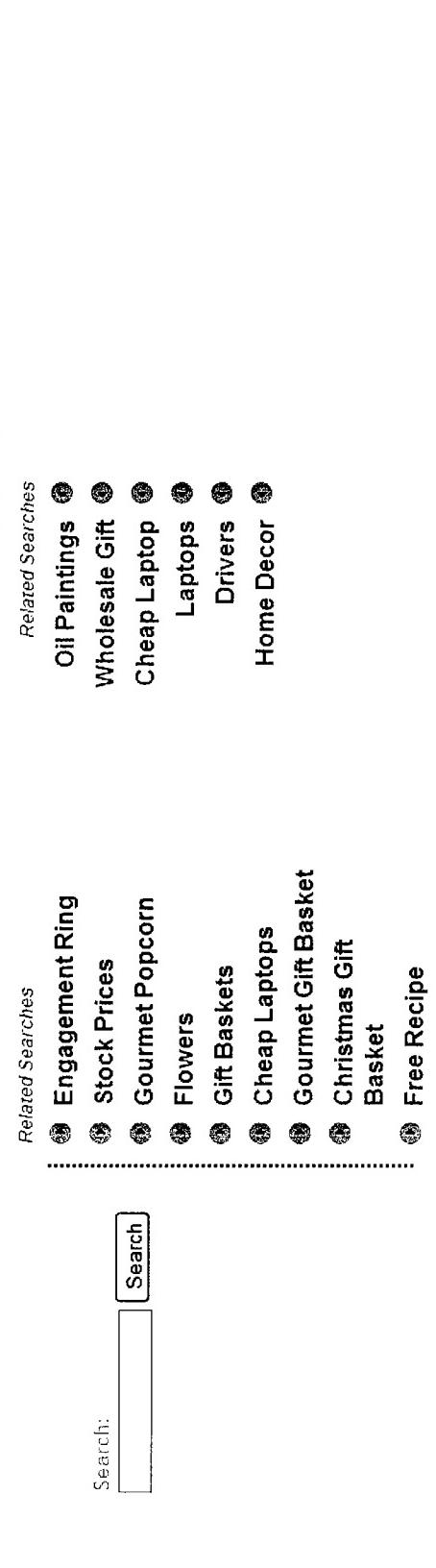
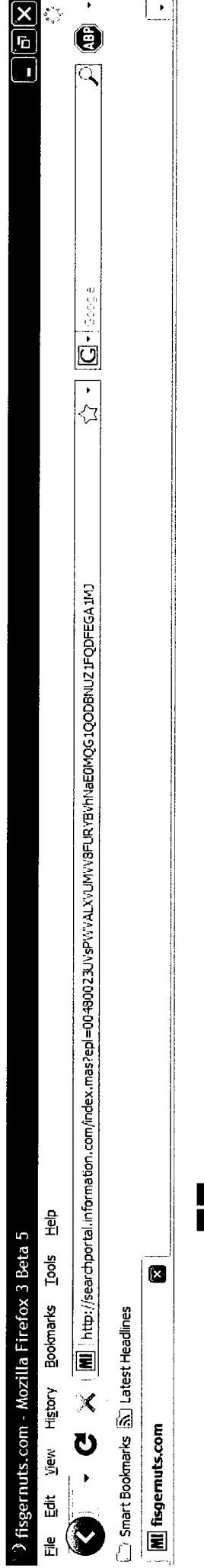
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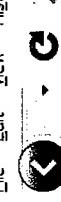
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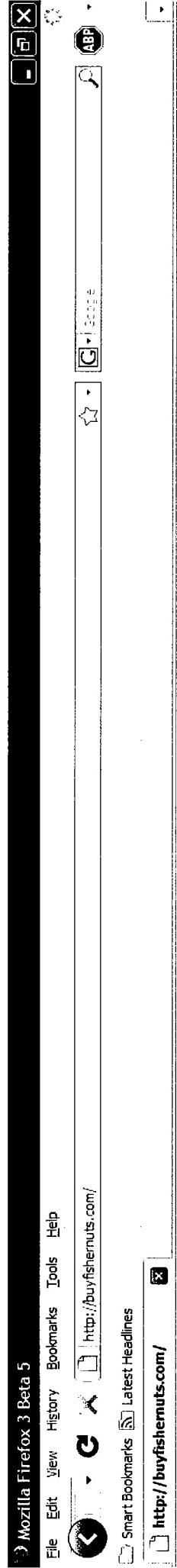
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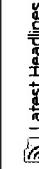
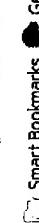
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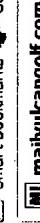
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